

**ILLINOIS GAMING BOARD
MINIMUM INTERNAL CONTROL STANDARDS
SECTION G - CASINO CASHIERING AND CREDIT**

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General

1. Casino cage procedures for table fills and credits and issuance of table game markers are included in Section C of the MICS.
2. Casino cage procedures for EGD hand-paid payouts and issuance of EGD markers are included in Section E of the MICS.
3. Casino cage procedures for the purchase of the drops are included in Section F of the MICS.

Location and Functions

1. The ICS must include a description of the locations, functions and controls of all casino cashiering areas (e.g., casino cages, main bank/vault, and Voucher Validation Terminals (Redemption Kiosks).
2. The functions must include a description of the various types of transactions performed by each casino cage area.
3. Owner Licensees are prohibited from redeeming gift certificates at casino cages or in conjunction with any gambling related activity.
4. Include procedures for the testing and maintaining of jetsorts.

Casino Cage Accountability

1. The assets for which the casino cage cashiers are responsible are maintained on an imprest basis and protected from unauthorized access.
2. At the end of each shift, the casino cage cashiers assigned to the outgoing shift must record on a cashier's count sheet the total of each casino cage cashier's inventory items counted and the total of the opening and closing cashier's inventories and must reconcile the opening inventory to the closing inventory.
3. Overages and shortages must be documented and must be investigated.
4. Both the outgoing and incoming casino cage cashier must sign the completed cashier's count sheet attesting to the accuracy of the information. If there is no incoming casino cage cashier, the countdown and verification and signatory requirements must be performed by a supervisor.
5. Either the main bank/vault or the casino cage must account for the change bank funds which are maintained on an imprest basis.
6. Either the main bank/vault or the casino cage must account for the Redemption Kiosks which are maintained on an imprest basis. Include procedures for the reimprestment of Redemption Kiosks.
7. All net changes in outstanding casino receivables are summarized on a casino cage accountability form on a per shift basis.
8. The casino cage cashier count sheets must be forwarded to the main bank/vault at the end of each shift.

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Main Bank/Vault Accountability

1. All transactions that flow through the casino cage must be summarized on a main bank/vault accountability form on a per shift basis.
2. All net changes in outstanding casino receivables are summarized on a main bank/vault accountability form on a per shift basis.
3. Increases and decreases to the main bank/vault inventory are supported by documentation.
4. Either the main bank/vault or the casino cage must account for the change bank funds which are maintained on an imprest basis.
5. Either the main bank/vault or the casino cage must account for the Redemption Kiosks which are maintained on an imprest basis. Include procedures for the reimprestment of Redemption Kiosks.
6. Copies of the main bank/vault accountability form and cashier count sheets and related documentation must be forwarded to the accounting department.

Even Exchanges

Procedures must be established for an even exchange of funds between two casino cage areas or between a casino cage area and change banks which include the following:

1. The designation of those employees who may process even exchange transactions;
2. Type of items exchanged; and
3. The sequence of the required signatures and the distribution of each part of at least a two-part even exchange form.

Chip and Token Inventories

1. Procedures must be established for the receipt, inventory, storage and destruction of gaming chips and tokens.
2. The IGB Docksites Supervisor/Agent must be notified prior to the delivery, of the time, date and location of delivery of any gaming chips or tokens.
3. At least two (2) employees from separate departments must open and check the chips or tokens received. Identify the departments involved in this process.
4. Any deviation between the invoice/packing slip amount or denomination and the actual chips or tokens received or any defects found in such chips must be promptly reported to the IGB Administrator.
5. Chip and token inventory ledgers must be maintained to record the receipt, disbursement and destruction of primary active, primary reserve and secondary gaming chips and tokens by denomination and non value chips by color. Signature requirements attesting to the accuracy of the information recorded in the ledgers must be included in the procedures.

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6. Identify the storage areas for the primary active, primary reserve, secondary and non value gaming chips.
7. Chips must be taken from or returned to the primary reserve chip inventory or the secondary set of chips in the presence of at least two (2) employees. Identify the employees involved in this process.
8. Inventories of chips in primary reserve and secondary set of chips must be made on a monthly basis and the results of such inventories must be recorded in the chip inventory ledger. Physical inventories may be performed annually if the inventory procedures incorporate the sealing of locked compartments. Include procedures for sealing and accessing these locked compartments.
9. During non-gaming hours all chips must be stored and locked in the casino cages, main bank/vault or in locked table trays at the gaming tables.
10. Prior to the destruction of chips and tokens the Owner Licensee must notify the IGB Administrator in writing of the date and the location at which the destruction will be performed, the denomination, numbers and amount of chips and tokens and the description and number of non-value chips to be destroyed and an explanation of the method of destruction.
11. The destruction of chips and tokens must be performed in the presence of at least two (2) individuals, one of whom must be an IGB Agent, unless otherwise authorized by the IGB Administrator.

Credit Transactions

1. Pages 1 and 2 of the casino credit application must be completed prior to the issuance of credit.
2. The ICS must provide that:
 - a. Each credit transaction is promptly and accurately recorded in the appropriate credit records;
 - b. Marker activity records (issuance, redemption and consolidation), deposit activity records and returned check activity records must be recorded in chronological order and reflect running balances;
 - c. The marker activity records must be maintained in a computerized and hard copy format; and
 - d. The marker activity records and computerized systems associated with credit transactions must be reconciled on a monthly basis.
3. Credit policies and procedures must be established for the following:
 - a. Approval of credit limit;
 - b. Increases to approved credit limit; and
 - c. Authority and documentation for reasons regarding full or partial write-offs of receivables.
4. No further credit will be extended to a patron as long as the patron has debt outstanding greater than 30 days old.

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5. Markers that are not redeemed must be deposited no later than thirty (30) calendar days after issuance.
6. Credit may be extended only in a commercially reasonable manner after considering the assets, liabilities, prior payment history and income of the patron. The method of this evaluation must be documented in the patron's credit records. Any increase to an approved credit limit must require a re-evaluation of the assets, liabilities, prior payment history and income of the patron. An approved credit limit may not exceed the amount of credit requested by the patron.
7. The following are acceptable sources for evaluating the patron's credit history:
 - a. A credit report from an established credit bureau. If no credit history exists for the patron, the documentation must be included in the patron's credit file to justify the credit issuance;
 - b. A financial institution at which the patron maintains an account. The Owner Licensee must verify the existence of the account;
 - c. Owner Licensee's records indicating a prior credit payment history; and
 - d. Information from other casinos regarding prior credit payment history.

All inquiries of credit history must be documented in the patron's credit records. Documentation must include the employee's signature, IGB identification number and the date of the inquiry.

8. Credit information for each patron to whom credit is extended must be maintained and include the following:
 - a. Casino credit application;
 - b. Documentation of the source and method of verifying the information recorded in the casino credit application utilized in determining the credit issuance level;
 - c. Approved credit limit;
 - d. Signature of individual(s) who authorized the approved credit limit;
 - e. A record of all credit issuances and payments;
 - f. A photocopy of the patron's verified I.D.; and
 - g. The patron's signature, which must be obtained in person, certifying he has reviewed the casino credit application.
9. The Owner Licensee must include in their ICS the maximum credit which can be authorized by respective job positions. Only supervisory levels and above will be authorized to approve credit.
10. Credit accounts with no outstanding credit balance that have been inactive for more than two (2) years must be closed. The Owner Licensee must process a new casino credit application for any patron who wishes to re-establish credit.
11. When credit is extended, the patron's credit information is accessed to determine:
 - a. The patron's approved credit limit; and
 - b. The remaining credit available.
12. Access to the credit information, outstanding credit instruments and credit instruments written off is restricted to those positions which require access and are so authorized by management.

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Issuance of Markers

Procedures must be established for the issuance of markers that include:

1. The designation of those individuals who may process the markers and a description of their duties;
2. A description of the sequence of the required signatures and the distribution of each part of the marker which must be evidenced by a multi-part form that supports the following:
 - a. An original negotiable marker subject to deposit in the patron's bank for collection;
 - b. A copy maintained with the original until the patron makes payment or the original is deposited;
 - c. A record of the issuance of credit which is later included in the cage accountability procedures; and
 - d. A control record of payment; and
3. Prior to issuing a marker to a patron, the patron's identity must be verified and documented and include:
 - a. The verification of available credit; and
 - b. The immediate recording of the credit transactions.

Redemption and Consolidation of Markers

1. All payments received on outstanding credit instruments are recorded on the Owner Licensee's records.
2. If a patron makes a payment with a personal check against their outstanding credit balances after they have reached their maximum approved credit limit, the Owner Licensee must not extend any credit to the patron (up to their maximum approved credit limit) until after five (5) bank business days from the date of deposit or verification that the check has cleared.
3. The issuance of any new markers must not be utilized to redeem previously issued markers.
4. Markers must only be redeemed at the casino cage or by mail.
5. The drawer of a marker may redeem it by exchanging any combination of check, cash, cash equivalents or gaming chips.
6. Include detailed procedures for the full or partial payment or redemption of a marker that is evidenced by a multi-part marker redemption form. These procedures must include a description of the following:
 - a. Consolidation of checks and markers;

The following checks may be used for payment or redemption:
 - i. Personal checks;
 - ii. Cashier's checks;

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- iii. Money orders;
 - iv. Traveler's checks; and
 - v. Wire transfer service checks.
 - b. Distribution of all parts of redeemed and consolidated markers;
 - c. Sequence of the required signatures attesting to the accuracy of the information contained on the form; and
 - d. Accounting for and recording payments received by mail.
7. When markers are consolidated, the new marker must bear the date of the oldest outstanding marker for purposes of aging the account - (FIFO).
8. On a daily basis, all markers received for consolidation, partial payment or redemption/exchange must be totaled for balancing by the casino cage cashier and forwarded to the accounting department for review. Accounting will ensure that no marker is aged past thirty (30) days.

Customer Deposits and Withdrawals

1. Customer deposits may include the following:
- a. Safekeeping deposit - Accepted from customers for the purpose of keeping their money on deposit for withdrawal at a later time; and
 - b. Front Money - Accepted from customers for the purpose of drawing markers against the deposit and/or withdrawing their money at a later time.
2. Only cash and cash equivalents will be accepted from customers for the purpose of a customer deposit.
3. Procedures must be established for the verification and documentation of the patron's identity.
4. A file for each patron must be prepared prior to acceptance of a deposit.
5. The receipt or withdrawal of a customer deposit must be evidenced by at least a two-part form with one part going to the patron and one part remaining in the casino cage file. Include procedures for the distribution of the various parts of the customer receipt or withdrawal form and any voided forms.
6. Describe the sequence of the required signatures attesting to the accuracy of the information contained on the customer deposit or withdrawal form ensuring that the form is signed by the casino cage cashier.
7. All customer deposit and withdrawal transactions at the casino cage are recorded on a casino cage accountability form on a per shift basis.
8. Procedures must be established for withdrawals from front money requested in the pit which must include:
- a. The live games supervisor/pit clerk contacts the casino cage cashier to ensure that sufficient front money is available to cover the transaction;
 - b. Prior to the withdrawal of front money the live games supervisor must verify the patron's identity;

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- c. Upon confirmation of the available front money requested, the live games supervisor must prepare a marker in compliance with the approved procedures; and
- d. The casino cage must immediately update its records for the withdrawal of front money issued in the pit.

Check Cashing Privileges

- 1. Policies and procedures must be established for the authorization and issuance of check cashing privileges. These procedures must include the approval process for establishing check cashing privileges and establishing and/or changing check cashing limits.
- 2. Only the following types of negotiable instruments may be cashed at a casino cage:
 - a. Personal checks;
 - b. Cashier's checks;
 - c. Money orders;
 - d. Credit card advance checks;
 - e. Traveler's checks; and
 - f. Wire transfer service checks.
- 3. Third party checks, including but not limited to payroll checks, must not be cashed.
- 4. Procedures must address how personal checks will be processed through a check guarantee service or cashed by the Owner Licensee. The procedures must include the job title(s) involved in the approval and payment process and the following:
 - a. If a check guarantee service approves payment of a personal check, the procedures required by the check guarantee service may replace the policies and procedures established for the authorization and issuance of check cashing privileges for patrons who cash individual personal checks. This is only applicable to the authorized maximum approval amount negotiated with the check guarantee service; and
 - b. Page 1 of the casino check cashing application must be completed and signed before the Owner Licensee may cash any personal check that:
 - i. is not processed for payment by a check guarantee service; or
 - ii. is not approved for payment by a check guarantee service.

Note: The ICS must include procedures for cashing personal checks that have been denied for payment by a check guarantee service, the criteria used to pay those personal checks and the job titles involved in approving payment of those personal checks.
- 5. The casino cage cashier will perform the following for all negotiable instruments cashed:
 - a. Examine the patron's valid government issued picture identification (i.e. driver's license or other government issued picture identification);
 - b. Record a driver's license number or other government issued picture identification number on the negotiable instrument;
 - c. Determine if the patron's available check cashing limit is sufficient to cover the amount of the personal check that is not processed or approved for payment by the check guarantee service;
 - d. Immediately stamp the negotiable instrument "for deposit only";

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- e. Date and time stamp the negotiable instrument;
 - f. Initial and include the last six numbers of his/her IGB Occupational License number on the negotiable instrument; and
 - g. Count out, in full public view, funds equaling the value of the negotiable instrument.
6. An Owner Licensee must not pay a personal check presented by a patron if:
- a. The patron's check cashing privileges have been limited pursuant to the MICS sections "Property Based Self-Exclusion Program", "IGB Statewide Voluntary Self-Exclusion Program" or "Limiting Check Cashing, Credit and Promotional Services";
 - b. The patron has reached his/her approved check cashing limit; and/or
 - c. The patron is currently in default:
 - i. on any credit or personal check obligation to the Owner Licensee; or
 - ii. on any personal check obligation to the check guarantee service.
7. Failure to deposit the receipt of personal checks for collection by the next banking day will be considered an extension of credit.
8. Procedures must address the buy-back of personal checks.

Returned Checks

- 1. Procedures must be established for collecting and recording checks returned to the Owner Licensee after deposit. Procedures must also address the re-deposit of checks returned to the Owner Licensee.
- 2. All checks returned to the Owner Licensee must be documented on a returned check log by the accounting department.
- 3. A continuous record of all checks returned to the Owner Licensee must be maintained by the collections department. The records must contain the following information:
 - a. Original date of the check;
 - b. Name and address of the drawer of the check;
 - c. Amount of the check;
 - d. Date the check was dishonored; and
 - e. Date(s) and amount(s) of any collections received on the check after being returned by a bank.
- 4. Owner Licensees must notify the check guarantee service of the following:
 - a. Checks returned to the Owner Licensee that were paid by the Owner Licensee; and
 - b. Checks returned to the Owner Licensee that were approved for payment by the check guarantee service.
- 5. Procedures must address the notification of the casino cage/credit departments of all checks returned to the Owner Licensee. The patron's credit/check cashing privileges must immediately be suspended until such time as the returned instrument has been paid in full.

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6. All checks paid by the Owner Licensee and returned to the Owner Licensee must be considered the issuance of credit.

Collection Efforts

1. A reasonable effort must be made to collect outstanding casino accounts receivable.
2. A record of all collection efforts must be maintained for each patron.
3. The licensee must make and document a valid collection effort at least once every thirty (30) days during the period the credit instrument is considered collectible.
4. Collection efforts must continue until an account is officially written off.
5. Owner Licensee's must notify the IGB Administrator in writing of all referrals for criminal litigation.

Settlement and Write-Off Procedures

1. An Owner Licensee may settle a credit instrument for less than face value as long as the settlement is with the patron to whom credit was initially extended or his legal representative. Any settlement for less than face value must be documented. All of the following information must be included in the documentation:
 - a. Patron's name;
 - b. Original amount of the credit instrument;
 - c. Amount of the settlement;
 - d. Date of the agreement;
 - e. Reason for the settlement;
 - f. Signatures of the Owner Licensee's employees who authorized the settlement; and
 - g. Patron's signature.
2. Authorization to write-off credit instruments are made and documented by, at a minimum, the signature of the credit manager and at least one non-gaming management representative who is from a department independent of the credit transaction. A patron's indebtedness may only be considered uncollectible after the following information has been included in the patron's credit file:
 - a. Documentation evidencing efforts to collect outstanding balances; and
 - b. Reasons why such collection efforts were unsuccessful.

Other Cash Transactions

Procedures must be established and documented in the ICS for foreign currency acceptance, electronic fund transfers, etc.

Exchange of Foreign Tokens

1. Foreign tokens inadvertently received in EGD drops must be recorded as drop on the tax return.
2. Foreign tokens must be separated by facility and denomination from the Owner Licensee's tokens and stored in a locked compartment in the main bank/vault.

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3. Foreign tokens exchanged with other Illinois Owner Licensees must be transported to the appropriate casino by an employee who is independent of the transaction (for example, a representative of the security department).
4. Foreign tokens must only be exchanged for an equal value of the Owner Licensee's tokens or a check.
5. The Owner Licensee must receive a signed receipt for the foreign tokens exchanged.

Coupons for Complimentary Cash or Chips

1. The ICS procedures for coupons for complimentary cash or chips must include:
 - a. Details for printing coupons for complimentary cash or chips in-house or the receipt of coupons for complimentary cash or chips from an outside vendor and the inventory, storage and distribution of the coupons, including the completion of a coupon inventory log; and/or
 - b. A statement that the printing of and distribution of coupons for complimentary cash or chips will be completed by a direct mail house or outbound electronic mailing vendor.
2. Each coupon for cash or chips must include the following:
 - a. A unique validation number if distributed by a direct mail house or outbound electronic mailing vendor or be sequentially numbered if distributed in-house;
 - b. The name of the casino and/or the Owner Licensee;
 - c. The value of the coupon and whether it may be redeemed for chips and/or cash; and
 - d. The expiration date and/or valid dates.
3. Each series of coupons distributed in-house by the casino must be distributed in sequential order.
4. If casino cage cashiers issue coupons, include procedures to ensure all coupons are accounted for.
5. Include casino cage procedures for the redemption of coupons for cash or chips.
6. Include procedures for issuing replacement coupons, if applicable.
7. Include procedures for canceling, counting, recording, and verifying coupons for cash or chips.

Redemption of Chips and Tokens at Casino Cages

Provide procedures for the redemption of chips and tokens by cash or by check dated the day of such redemption.

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Limiting Check Cashing, Credit and Promotional Services

Owner Licensees are required to adopt policies and procedures that allow patrons to limit access to check cashing, credit and/or promotional services. The ICS must include a description of the following:

1. Procedures by which a patron's name and address is flagged so that he/she is removed from all check cashing, credit and/or promotional services offered by the Owner Licensee. Identify the employees of the Owner Licensee responsible for reviewing and effectuating the removal;
2. Procedures by which the spouse of a patron can submit a written request to the Owner Licensee for a temporary cessation of check cashing and/or credit services to a patron, that, at a minimum, results in a temporary stop to such services until a written determination on the request is made by the Owner Licensee. A copy of the written request must be provided to the IGB Docksites Supervisor/Agent within two days of the request. A copy of the written determination must be provided to the IGB Docksites Supervisor/Agent within two days of issuance of the determination; and
3. A statement that the Owner Licensee will make available, in written form at each casino cage and credit location, information explaining these procedures.

Vouchers Issued at Casino Cages

1. Vouchers issued through an approved voucher printer linked to the voucher system at a casino cage must comply with IGB Rule 3000.635.
2. The ICS must include procedures for the issuance of a voucher at the casino cage.
3. The ICS must include procedures to ensure that a voucher is not issued to any person on the IGB statewide voluntary self-exclusion list, the Owner Licensee's property based self-exclusion list, and the IGB's Board exclusion list.
4. The ICS must include a statement that a voucher can be issued from an approved voucher printer at a casino cage with a value of no more than \$3,000.00.
5. The ICS must include casino cashiering procedures for tracking and reconciling vouchers issued at a casino cage. Variances must be documented and investigated.
6. All documentation and reports pertaining to the issuance of a voucher at a casino cage must be forwarded to the accounting department by the end of the gaming day.

Redemption of Vouchers at Casino Cages

The Voucher System must be linked to hardware (i.e., workstations/terminals) located within the casino cages wherein bar code scanning devices are utilized for the purpose of validating and redeeming the printed vouchers that are presented by the patron. At the point a voucher is scanned (validated) at a casino cage, the voucher(s) is noted as redeemed in the Voucher System and cannot be utilized a second time.

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The procedures concerning the redemption of a voucher presented by a patron are as follows:

1. At the beginning of the casino cage cashier's shift, he/she must log into the Voucher System. This will allow for the redemption and validation of vouchers;
2. When the voucher is presented to a casino cage cashier to be redeemed, the casino cage cashier scans the bar code, or enters the voucher number manually. The voucher at that point will be validated in the Voucher System and changed from an unpaid status to a paid status;
3. The casino cage cashier must then pay the patron by cash or by check dated the day of such redemption; and
4. All vouchers must be forwarded to the accounting department at the end of each gaming day for reconciliation and retention.

Voucher Validation Terminals (Redemption Kiosks) – Fund Accountability Procedures

1. Procedures surrounding the impressment of a Redemption Kiosk must be described in detail in the ICS.
2. Surveillance must be notified in order to monitor and video tape/digitally record the impressment, drop, count, and reconciliation of a Redemption Kiosk.
3. Currency cassettes must be imprest by either a casino cage cashier or by a count room representative and verified by a different casino cage cashier or a count room representative.
4. The casino cage cashier(s) or count room representative(s) who reconcile a Redemption Kiosk cannot be the same casino cage cashier(s) or count room representative(s) who reimprest the cassettes to be loaded in a Redemption Kiosk.
5. The impressment of a Redemption Kiosk, including the drop of the vouchers and currency accepted by the bill validator, must be performed in the presence of a security officer.
6. Currency cassettes that have been imprest must be secured with a lock or tamper resistant seal, and if not placed inside a Redemption Kiosk, must be stored in the main bank/vault or other secured area as described in the Owner Licensee's ICS.
7. Procedures pertaining to the reconciliation of the Redemption Kiosk must be described in the ICS. Include a description of the reports to be utilized in the reconciliation process.
8. If, upon reconciliation, there is a variance, a cage supervisor or count room supervisor will notify their manager. The variance will be documented and investigated.
9. All documentation pertaining to the impressment (funds transfer and vouchers), reconciliation and/or variance associated with a Redemption Kiosk must be forwarded to the accounting department by the end of the gaming day.